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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**GOOGLE LLC'S SUBMISSION IN  
RESPONSE TO DKT. 179 RE:  
DISCOVERY DISPUTES TO BE  
ADDRESSED AT JUNE 2, 2021  
HEARING**

Referral: Hon. Susan van Keulen, USMJ

1 Pursuant to Your Honor's May 27, 2021 Order (Dkt. 179), Google LLC ("Google") submits  
2 this statement identifying the following four issues it deems critical to address at the June 2, 2021  
3 discovery hearing:

- 4 i. Dispute P4, Google Server Logs;
- 5 ii. Dispute P10, Google timeline for producing custodial documents;
- 6 iii. Dispute P15, cross-use;
- 7 iv. Dispute D3, Google's Requests for Production Nos. 2, 7.

8 Further, for the reasons stated in the submission, Google does not believe that it is critical to  
9 address P1 (selection of Google custodians) and P3 (Google's production of Plaintiffs' data and clean  
10 room access) at the hearing. However, to the extent the Court is willing to consider those issues now,  
11 Google respectfully requests that the Court reject Plaintiffs' Proposed Orders and order a briefing  
12 schedule instead.

13 Finally, for the reasons stated in the submission, the following disputes are not ripe. To the  
14 extent the Court is willing to consider those issues now, Google respectfully requests that the Court  
15 order the parties to continue to meet and confer to resolve them:

- 16 i. Dispute P2, Google's search terms;
- 17 ii. Dispute P6, class member identification;
- 18 iii. Dispute P7, logged in and logged out;
- 19 iv. Dispute P13, Google's responses to Interrogatory Nos. 5-7;
- 20 v. Dispute P14, access to non-public Google source code.

1 Respectfully,

2 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**

3 By: /s/ Andrew H. Schapiro

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